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September 22, 2000  
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Richard Collier, Esq.  
Hearing Officer  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: *Petition of MCI WorldCom to Enforce Interconnection Agreement  
with BellSouth*  
Docket No. 99-00662

Dear Richard:

As you requested, MCI WorldCom, Inc. ("MCI WorldCom") submits the following comments regarding the need for an oral hearing in the above-captioned proceeding.

This case is a complaint by MCI WorldCom to enforce an interconnection agreement with BellSouth Telecommunications, Inc. ("BellSouth") in order to collect reciprocal compensation for calls made to Internet Service Providers ("ISPs").

MCI WorldCom does not believe there is need for a trial-type hearing in this case which is very similar to other reciprocal compensation complaints previously heard by the agency. Here, both parties agree that there was no discussion about the reciprocal compensation issue at the time the agreement was negotiated and signed. *See Response of MCI WorldCom to BellSouth Interrogatories*, no. 26 and 27. While each party has its own view of the meaning of the contract and the legal and regulatory landscape, there would appear to be no useful purpose served by cross-examination regarding these matters. MCI WorldCom therefore suggests that the pre-filed testimony be submitted, as filed, without a trial-type hearing.

In the alternative, MCI WorldCom would also be willing to agree to admit into the record the transcript of proceedings in Georgia (docket 68 65U), Florida (docket 97-1478-TP) and/or North Carolina (docket P55, sub 1094) in which this identical issue was fully litigated between BellSouth and MCI WorldCom.

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Finally, MCI WorldCom would also be willing to handle cross-examination through depositions of the two witnesses, both of whom are based in Atlanta. Each side could fully cross-examine the other side's witness and then file the transcript of the cross-examination with the Hearing Officer.

Any of these alternatives is acceptable to MCI WorldCom.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

  
Henry Walker

HW/nl  
c: Guy Hicks